

ENVIRONMENTAL WASTE COMPLIANCE GUIDANCE



KAISER-HILL
COMPANY

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INTEROFFICE MEMORANDUM

DATE: April 22, 1996
TO: Distribution
FROM: Karan North, Compliance & Performance Assurance, Bldg. T130C, X9876 *KN*
SUBJECT: ENVIRONMENTAL/WASTE COMPLIANCE GUIDANCE NO. 11 - "PENDING" AND "CONTAINERS NOT DESCRIBED" PARAMETERS IN THE WASTE ENVIRONMENTAL MANAGEMENT SYSTEM (WEMS) - KN-063-96

Guidance

Effective immediately the WEMS should be programmed to prohibit the use of the waste type parameter "PND" (Pending). By using this parameter the Site cannot accurately report the quantity of waste being stored by the primary waste type field. In addition, containers identified as "CND" (Containers Not Described) should have an identified capacity associated with the container.

PND or Pending

Before the conversion of WEMS from the Mantis to the Oracle database, there were thousands of containers in the WEMS database identified with the "LAB" (awaiting assay or characterization) designation. By using the "LAB" parameter, the generator avoided making a waste type determination. The "LAB" parameter was eliminated in the Oracle version of WEMS, but unfortunately, a "PND" or pending parameter was created, resulting in the same effect as the "LAB" parameter.

CND or Container Not Described

Another required parameter when entering information into the WEMS database for any container is the container type. The container type allows the system to calculate the volume of waste stored on the Site by the size of the container. For example; a container type identified as a "DRO" is a 55-gallon white open top drum.

Guidance

There are two very important reasons for eliminating the "PND" parameter and requiring a container capacity for a "CND" container in WEMS. The first reason is to obtain accurate reports the quantity of waste on Site. The Colorado Hazardous Waste Regulations, 6 CCR 1007-3, Sections 264.73 and 265.73, Operating Record, requires "the location of each hazardous waste within the facility and the quantity at each location." The second reason is required by the Site's Part B Operating Permit, Part IV, Waste Analysis Plan, Table 1. As part of the Site's waste acceptance criteria for permitted storage areas, a radioactivity designation must be made (i.e., LL, TRU, RES). Therefore, all containers currently identified in WEMS should have an assigned waste type and an associated capacity recorded in WEMS.

Generators or custodians (if the containers are already in storage) are requested to remove the "PND" designation and determine the waste type, judging by what type of liners were used to package the waste, how the waste was generated (non-line versus line generated) or using analytical data. For example; if a white 55-gallon drum with two poly bags is used to package waste or the non-line generated box is checked and a hazardous waste label is applied, the waste type should be low-level mixed or "LLM". If a white 55-gallon drum with a rigid liner is used to package waste or the line generated box is checked and a hazardous waste label is not applied, then the waste type should be transuranic or "TRU".

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WEMS maintains a listing of the container type descriptions and their standard container capacity. Whenever possible, container types from this listing should be used instead of "CND". In those instances where the listed container types and descriptions do not correspond to the actual waste container, the "CND" type can be used. However, a container capacity must be entered into WEMS because this data is used to determine the total amount of waste stored on Site.

Waste Information and Documentation (WID) is in the process of eliminating the "PND" parameter from the WEMS database on all active containers. In addition, WID has been asked to identify all "PND" containers and containers marked as "CND" without a corresponding capacity. The Unit Owners responsible for these containers will be notified by WID and asked to resolve these parameters. The applicable procedures affected by this guidance must be changed as required.

If you have any questions, please contact Karen Lavorato at extension 6651.

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